

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT NEW YORK**

**DEBORAH D. PETERSON,  
Personal Representative of the Estate  
Of James C. Knipple, Deceased, et al.**

**Plaintiffs**

**v.**

**10 Civ. 4518(KBF)**

**ISLAMIC REPUBLIC OF IRAN, BANK  
MARKAZI a/k/a CENTRAL BANK OF IRAN**

**Defendants**

**ORDER DIRECTED TO TRUSTEE  
REGARDING DISBURSEMENT OF REMAINING  
QUALIFIED SETTLEMENT FUNDS**

Upon the Motion Regarding Disbursement Of Remaining Qualified Settlement Funds, it  
is this \_\_\_\_\_ day of \_\_\_\_\_, 2017

**ORDERED,**

(1) That the Trustee, Stanley Sporkin, within 30 days of the date of entry of this Order, make a full disclosure to all Counsel for the Plaintiffs, Counsel for the Follow Up Plaintiffs, and, upon their request, to any of the plaintiffs in the above action or follow up cases arising as a result of the terrorist attack of October 23, 1983 at Beirut, of all disbursements, costs, and any other amounts paid from the QSF established by this Order of this Court on July 9, 2013; and

(2) That the Trustee, Stanley Sporkin, within 30 days of the date of this Order, disburse the amount of attorney's fees set forth on the attached schedule to the attorneys listed therein; and,

(3) That the Trustee, within 60 days of the date of this Order, file on the record of the Court a statement, under oath, setting forth a schedule for disbursement of the remaining funds being held in the QSF established by Order of this Court on July 9, 2013, said disbursement to occur not more than 60 additional days from the date of receipt by the Court of the statement under oath, and,

The Court shall retain continuing jurisdiction over the Qualified Settlement Fund pursuant to Treasury Regulation 1.468.13.

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**KATHERINE B. FORREST**  
**United States District Judge**

**PETERSON FUND**  
**INTERIM ATTORNEY FEE PAYOUT**

**DRAFT FOR APPROVAL BY ATTORNEYS**  
**PRIVILEGED AND CONFIDENTIAL**

**CARAGH FAY, ESQ'S**  
**CALCULATIONS AND**  
**ASSUMPTIONS<sup>1</sup>**

<u>ATTORNEY</u>	<u>TOTAL ATTORNEY FEES FROM FIRST ROUND OF DISTRIBUTIONS</u>	<u>PROPOSED DISTRIBUTIONS: \$250 MILLION TOTAL ATTORNEY FEES</u>	<u>RATIO</u>
NY ATTORNEYS:			
SALON MARROW	\$ 49,332,993	\$ 24,375,000	9.7500001%
BONNER	21,220,661	10,484,943	4.1939772%
FLEISCHMAN	3,612,963	1,785,133	0.7140534%
TOTAL NY ATTORNEY FEES	\$ 74,166,617	\$ 36,645,077	14.6580306%
ROTHENBERG / LASPADA	\$ 84,931,391	\$ 41,963,857	16.7855429%
FAY <sup>2,3</sup>	127,382,308	62,938,484	25.1753936%
PERLES <sup>3</sup>	127,382,308	62,938,484	25.1753936%
GASKILL	6,690,423	3,305,679	1.3222718%
KARR <sup>4</sup>	2,148,986	1,061,795	0.4247181%
HNK	32,258,031	15,938,411	6.3753644%
DRENNAN	10,490,755	5,183,390	2.0733561%
DONAHUE	10,490,755	5,183,390	2.0733561%
TOTAL	\$ 401,774,957	\$ 198,513,491	79.4053966%
DAMAGES ATTORNEYS:			
Bond	\$ 1,876,957	\$ 927,388	0.3709552%

Clower	1,874,232	0.3704166%	926,041
Drennan	2,578,511	0.5096079%	1,274,020
Einhorn	1,264,676	0.2499462%	624,865
Feeney	2,793,943	0.5521851%	1,380,463
Gaskill	2,586,882	0.5112623%	1,278,156
Glenn <sup>5</sup>	1,716,872	0.3393165%	848,291
Karr <sup>4</sup>	1,697,693	0.3355261%	838,815
LaSpada	3,498,404	0.6914123%	1,728,531
Mecit	1,289,033	0.2547601%	636,900
Norman	2,536,282	0.5012619%	1,253,155
Nuta	2,104,021	0.4158313%	1,039,578
Parsons	755,987	0.1494106%	373,527
Pattin	1,871,554	0.3698873%	924,718
Fay Perles	1,592,789	0.3147932%	786,983
TOTAL DAMAGES ATTY FEES	\$ 30,037,836	5.9365728%	\$ 14,841,432
TOTAL ATTORNEY FEES	\$ 505,979,410	100.0000000%	\$ 250,000,000

**NOTES:**

<sup>1</sup>Please note the following:

(i) Engagement attorney fees are calculated after deducting NY attorney fees, damages attorney fees & referral attorney fees.

Fleischman-3.5% of Valore, Bonk, Arnold & Spencer I; Bonner- 1.5% of all others and then allocated pro-rata to all groups.

Bonk cases after subtracting the NY attorney fee and the damages attorneys' fees (based on C Fay Esq's calculations). There are some clients within the Peterson & Bonk cases in which

(iv) Caragh's assumptions allocate NY attorney fees pro-rata to each group, however, Fleischman (whose fee was 3.5%) worked on the four Valore groups and Bonner (whose fee was 1.5%) worked on the remaining groups. (Salon Marrow worked on all groups.)

(v) Spencer II is allocated on a case by case basis. We used a ratio by attorney based on total judgment amounts allocated to each attorney for the group (per Caragh's assumptions), and assumed partial attorney fees will be made using those ratios, despite the fact that actual



<sup>2</sup>Of this amount, Fay received \$6 million, which was paid on his behalf to Gibson Dunn at the request of Messrs. Fay and Perles.

<sup>3</sup>These amounts include referral fees that are net of payment to NY attorneys and damages attor

<sup>4</sup>Payment to be withheld and reserved by Trustee pending resolution of conflict of interest issue.

<sup>5</sup>Payment to be withheld and reserved by Trustee pending resolution of dispute.